



## DESCRIPTION OF PRIVILEGED DOCUMENTS

<u>Abbreviation</u>	<u>Description</u>	<u>Name</u>
AEF	Attorney	Anthony E. Flanagan
AS	IHI Employee	Angie Stewart
AW	IHI Employee	Anna Washburn
BEW	Attorney	(and/or Anna Washburn)
BML	Attorney	Brent Wood
CR	Attorney	Bettina M. LaRocca
CS	Defendant	Chris Reid
CTF	Attorney	Claude Savage
DA	Attorney	Charles Francis
DH	IHI Employee	Dan Applewhite
DL	Attorney	Dwight Hallman
DM	IHI Employee	David Long
EJBM	Accounting Firm	Dawn McIntyre
FDB	Attorney	Eilers, Jones, Brown, & McLeod
GMM	Attorney	F. Daniel Bell
JAB	Attorney	Georgina Mollick
JB	IHI Employee	Jeffery A. Babener
JK	?	John Brothers
KB	IHI Employee	John Keushner
KMS	Attorney	Kimberly Barnes
LS	Defendant	Kenneth M. Silverman
LWB	Attorney	Larry Smith
MV	Attorney	Leonard W. Burningham
RB	Attorney	Michael Valerio
RS	Attorney	Robert Brunton
RSH	Attorney	Ryan Smith
SMH	Attorney	Richard S. Heller
SVE	Defendant	Susan M. Halpern
		Stan Van Etten

(WP) - Work Product

(A/CP) - Attorney Client Privileged

\* - Possibly/Probably Non-Privileged

BOX 96W342I 01

- GMM to Janet Quick, November 29, 1995 Ragsdale Liggett & Foley memorandum concerning IHI (WP)
- 5-1-95 Email from George Ragsdale to GMM concerning IHI (A/CP)
- 4-28-95 message from GMM to Ragsdale Liggett & Foley attorneys (A/CP)
- GMM to CS, LS, SVE, BEW 10-26-95 letter (A/CP)
- GMM to Gary Johnson (IHI employee) 10-5-95 letter (A/CP)
- GMM to file 10-5-95 memo (A/CP)
- GMM to Gary Johnson (IHI employee) 10-3-95 email transmission (A/CP)
- GMM to SVE 9-6-95 letter (A/CP)

- George Ragsdale to GMM email dated 5-1-95 (A/CP)
- GMM to file 9-19-95 letter regarding Jack Weatherly (WP)
- GMM to SVE 8-9-95 letter concerning IHI (A/CP)
- JAB to SVE 10-28-96 letter sent by fax 24 pages in length (A/CP)
- GMM to AW 5 page fax containing numerous handwritten notes by GMM (A/CP)
- AW to GMM fax communication 7 pages (A/CP)
- AW to GMM 10-18-96 twelve page fax (A/CP)
- SVE to JAB and FDB 9-13-96 letter with enclosures (A/CP)
- GMM to SVE 3-31-97 two page fax (A/CP)
- GMM to AS 2-5-97 ten page fax (A/CP)
- AS to GMM 10-29-96 eight page fax (A/CP)
- SVE to JAB and FDB 10-24-96 letter two pages with enclosures (A/CP)
- GMM to AS 8-14-96 letter with significant edits to James Welch, Assistant Attorney General, Topeka, Kansas (WP)
- AS to GMM 4-15-96 three page fax (A/CP)
- SVE to FDB and JAB 3-19-96 letter draft (A/CP)
- GMM to AS and SVE 3-19-96 four page fax (A/CP)
- GMM to AS and SVE 3-19-96 five page fax (A/CP)
- GMM to SVE 3-19-96 five page fax with numerous handwritten notes (A/CP)
- IHI's State of Michigan Folder
  - GMM to AS 12-2-96 six page fax (A/CP)
- Montana Inquiry
  - SVE to FDB 3-27-96 three page letter with enclosure (A/CP)
  - GMM to AS and SVE 3-28-96 five page fax (A/CP)
  - SVE to GMM 3-14-96 five page fax (A/CP)
- NC Inquiry
  - Handwritten notes of GMM (WP)
  - AS to GMM 4-18-96 four page fax (A/CP)
- State of Oklahoma Inquiries
  - IHI Employee A. Wilson to GMM 5-15-97 five page fax (A/CP)
  - FDB to Patricia Labarthe, Esq. May 9, 1997, three page letter (A/CP)
  - GMM to SVE JB, FDB and CR 5-1-97 five page fax (A/CP)
  - Patricia Labarthe to GMM 4-28-97 one page letter (A/CP)
  - GMM to SVE 12-23-96 four page fax (A/CP)
  - Work-Product – GMM handwritten notes and notes to legal assistant (WP)
- Texas Inquiry
  - GMM to SVE, JB, CR 5-16-97 letter with enclosures (A/CP)
  - GMM to SVE 5-12-97 letter with enclosures (A/CP)

- GMM to FDB 4-25-97 fourteen page fax (A/CP)
- FDB to Kenneth Cooper 4-25-97 three page letter (A/CP)
- GMM to FDB 4-25-97 two page letter (A/CP)
- Work-product – page of handwritten notes from GMM (WP)
- Work-product – draft letter to George Denslow with edits and notes from GMM (WP)
- Work-product – page of handwritten notes from GMM (WP)
- GMM to JB 4-22-97 three page fax (A/CP)
- GMM to FDB 4-15-97 two page letter with enclosures (A/CP)
- GMM to RSH 8-9-96 fax (A/CP)
- AS to GMM 4-10-97 eleven page fax - this document is actually a 13 page fax transmission (A/CP)
- Patrick Holt, Montana Jewlay Rep., GMM to SVE 5-21-96 eight page fax
- Work-product – 5-20-96 handwritten notes from GMM concerning meeting with SVE and JB (WP)
- GMM to SVE and FDB 5-20-96 (A/CP)
- GMM to SVE and FDB 5-7-96 two page fax (A/CP)
- GMM to JB and SVE 5-2-96 three page fax (A/CP)
- GMM to JAB and FDB 4-30-96 nine page fax (A/CP)
- Work-product – handwritten notes from GMM several pages (WP)
- GMM to SVE 4-30-96 five page fax (A/CP)
- GMM to SVE 4-29-96 four page fax (A/CP)
- Work-product – 4-29-96 handwritten notes by GMM concerning Pat Holt matter (WP)
- Knowles secured loan 7-19-95
- GMM to SVE 10-27-95 letter with enclosures (A/CP)
- Canadian Settlement and Release Agreement
  - Work-product – 4-11-96 handwritten notes from GMM telephone conference with Sabrina Wei (WP)
  - GMM to Stephani Harris at IHI 1-2-96 nine page fax (A/CP)
  - GMM to IHI Canada and Felix Li 12-15-95 letter with enclosure (A/CP)
  - Fax communications from GMM and SVE sent November and December 1995 (A/CP)
  - Handwritten notes by GMM (WP)
- IHI/Family of Eagles
  - GMM to SVE 11-15-95 fax (A/CP)
- Design of Stock Agreement
  - GMM to JAB 8-30-95 two page fax; 8-23-95 three page fax; 8-22-95 three page fax (A/CP)
- MLM Entrepreneur Conference Dallas 4-27-96
  - GMM to IHI Board of Directors Memorandum eight pages 5-1-96 (A/CP)
  - AS to GMM fax twelve pages, GMM to SVE eight page fax, 5-1-96 (A/CP)
  - Work-product – several pages 4-27-96 handwritten notes GMM (WP)

- Advertising periodical
- IHI Catalog
  - From IHI employee to GMM 8-24-95 two page fax with numerous edits by GMM (A/CP)
- IHI/Premium Concepts Licensing Agreement
  - SVE to GMM 7-14-95 thirteen page fax of draft manufacturing license agreement (A/CP)
  - Additional draft agreements with numerous handwritten notes by GMM (WP)
  - Handwritten notes by GMM (WP)
- Consolidated Balance Sheet 8-14-95
  - Preliminary drafts for discussion purposes only for IHI Consolidated Balance Sheet dated August 14, 1995 (WP)
- Blue Sky Research (States other than NC)
  - Folder contains handwritten notes of GMM, as well as state law research and Blue Sky regulations for Alabama, Louisiana, Nevada and Virginia (WP)

**BOX 96W342I 01A**

- Van Etten/IHI Triangle Business Journal Article
  - 8-8-97 facsimile transmission from GMM to SVE (A/CP)
  - 8-8-97 facsimile transmission from GMM to RSH and Steven Wolosky (A/CP)
  - 4-23-97 facsimile transmission from GMM to RSH, Steven Wolosky and Ken Silverman (A/CP)
- Macon, Georgia
  - 3-5-97 handwritten notes from GMM (WP)
  - 3-4-97 facsimile transmission from AW to GMM (A/CP)
  - 3-3-97 facsimile transmission from AW to GMM (A/CP)
  - 2-28-97 facsimile transmission from AW to GMM (A/CP)
  - 2-28-97 facsimile transmission from AW to SVE c/o GMM (A/CP)
  - 2-24-97 memorandum from SVE to JAB, FDB and GMM (A/CP)
  - 2-19-97 draft letter to Special Agent Jalaine Ward (WP)
- Audit Inquiry
  - 1-15-97 letter from Clark Jones to GMM (A/CP)
  - 2-4-97 memorandum from GMM to John Austin, Julie Bell, CTF, BEW and Alan Woodlief (A/CP) (WP)
  - 2-5-97 email transmission from Julie Bell to GMM (A/CP)
  - 2-5-97 memorandum from CTF to GMM (A/CP) (WP)

- 2-4-97 memorandum from GMM to John Austin, Julie Bell, CTF, BEW and Alan Woodlief (A/CP) (WP)
- 1-3-97 billing statement from Wood & Francis, PLLC to IHI (A/CP)
- 7-31-96 letter from Clark Jones to GMM (A/CP)
- 7-31-96 facsimile transmission of Clark Jones letter to GMM sent from Pam Patrick to GMM (A/CP)
- IHI Employee Handbook
  - Draft of Employee Handbook for International Heritage, Incorporated with handwritten notations from GMM (WP)
- International Heritage, Inc. Employee Personnel Policies
  - 10-8-96 letter from Carolyn A. Bean, personnel manager IHI, to GMM with enclosure (A/CP)
- MCI
  - 3-26-97 letter from BEW to DH (A/CP)
  - 3-26-97 facsimile transmission from BEW to DH (A/CP)
  - 3-10-97 phone message from DH to BEW (A/CP)
  - 3-11-97 phone message from DH to BEW (A/CP)
  - 2-10-97, 3-26-97 and 4-14-97 pages of handwritten notes from BEW (WP)
  - 2-20-97 facsimile transmission from DH to BEW (A/CP)
  - 1-25-97 invoice from MCI with numerous handwritten notes (WP)
- Miscellaneous documents
  - 11-7-96 facsimile transmission from AW to GMM (A/CP)
  - 12-9-96 letter with enclosure from Linda Halstead of Wood & Francis to Clark Jones (IHI employee) (A/CP)
  - 4-17-97 handwritten notes from GMM with 4-4-97 facsimile transmission from Bill Ulmer to GMM (WP)
  - 4-16-97 handwritten notes of GMM (WP)
  - 3-26-97 handwritten notes from GMM (WP)
  - 3-25-97 handwritten notes from GMM (WP)
  - 4-12-97 handwritten notes from GMM (WP)
  - 2-26-97 handwritten notes of GMM (WP)
  - 3-27-97 nine page facsimile transmission from Ken Rudd to GMM (A/CP)
- TLC Communications
  - 7-15-97 facsimile transmission from GMM to CR (A/CP)
  - 7-1-97 draft letter to TLC Communications with substantial handwritten notes and edits from GMM (WP)
  - 6-30-97 facsimile transmission from CR to GMM (A/CP)

6-5-97 handwritten notes of GMM (WP)

**BOX 96W342I 02**

- Tabulation Results
  - 8-21-95 handwritten notes of GMM (WP)
  - 8-24-95 five page fax to Sheila Stansill by GMM with attachments (A/CP)
  - 8-22-95 five page fax from GMM to Sheila Stansill (A/CP)
- U-7 Offering
  - Correspondence from Thomas Applewhite of Wyrick Robbins to GMM from August and November 1995 (A/CP)
  - Correspondence from FDB to SVE August (A/CP)
  - October and December 1995 handwritten notes of GMM (WP)
  - Several drafts of IHI offering circular, each containing handwritten notes of GMM (WP)
  - Draft of letter to Perry R. Boseman with handwritten notes from GMM (WP)
- NC Securities Exemption
  - June 13, 1995 correspondence from FDB to SVE (A/CP)
  - Handwritten notes from GMM (WP)
  - Blue Sky regulation research (WP)
  - Draft of IHI Statement of Issuer (WP)
  - Draft Uniform Form of Corp resolution of IHI (WP)
- Regulation A offering
  - Correspondence by and between GMM, SVE, FDB, RSH, as well as Randolph Fletcher of Moore & Van Allen (A/CP)
  - Attorney notes 3-25-96, 7-26-96 and other handwritten notes by GMM (WP)
- IHI Policies and Procedures drafting
  - Numerous draft documents by and from GMM to AS at IHI containing numerous handwritten notes and edits by GMM (WP)

**BOX 96W342I 03**

- 5-9-95 client profile of IHI by Ragsdale, Liggett (A/CP) (WP)
- Correspondence (11-26-96)
  - Correspondence between: JSH, GMM, Steven Wolosky, AS and memorandum from AS to IHI Board of Directors (A/CP)
  - Correspondence included from GMM to DM, AS, BEW and CTF; items dated May, June and August 1997 (A/CP)

- Correspondence from GMM to SVE and correspondence June 11, 1997 from GMM to Eugene J. Stroz, Jr. (A/CP)
- 2-18-97 five page fax from GMM to DH, IHI with 2-18-97 handwritten notes of GMM (A/CP)
- 2-10-97 and 1-28-97 correspondence from Bruce Edwards to DH of IHI (A/CP)
- Correspondence from April and May 1997 from GMM to RSH, Steve Wolosky and BEW (A/CP)
- Correspondence from BEW to SVE and fax from Gary Williams to GMM (A/CP)
- Billing statements from Shustak, Jalil and Heller (A/CP)
- Various correspondence from GMM to IHI employees (A/CP)
- 2-25-97 Correspondence from GMM to JAB (A/CP)
- 1-29-97 correspondence from AS to GMM (A/CP)
- Correspondence 10 (8-1-96 through 11-25-96)
  - Correspondence by and between DM, GMM and AS from Sept. & Nov. 1996 (includes draft letter document with numerous handwritten edits by GMM sent to AS as well as other documents with edits by GMM) (A/CP) (WP)
  - 10-4-96 correspondence from GMM to JB (A/CP)
  - 9-27-96 correspondence from SVE to GMM (A/CP)
  - Correspondence from GMM to Clark Jones, AW, JSH, AS (A/CP)
- Correspondence 9 (4-1-96 through 7-1-96)
  - 7-16-96 correspondence from BEW to SVE (A/CP)
  - 7-22-96 correspondence from JAB to SVE (A/CP)
  - 6-7-96 correspondence from SVE to Frank Liggett, III (A/CP)
  - 7-1-96 correspondence from GMM to RSH (A/CP)
  - 6-19-96 correspondence from Steven P. Stewart (Ragsdale Liggett) to GMM (A/CP)
  - other correspondence between GMM and the Ragsdale Liggett law firm (A/CP)
  - Correspondence from IHI employees such as AS to GMM and from GMM to IHI employees and personnel (A/CP)
  - 5-13-96 correspondence from Pam Patrick to GMM (A/CP)
  - 4-20-96 memo from AW to IHI Board of Directors (A/CP)
  - 4-4-96 letter from GMM to James Law (A/CP)
- Correspondence 10 (8-1-96 through 11-25-96)
  - 10-10-96 correspondence from GMM to SVE (A/CP)
  - 8-8-96 correspondence from AW to SVE, Jeff Hooks and GMM (A/CP)
  - 8-2-96 correspondence from GMM to Diana Wilson (A/CP)
- Correspondence 8 (3-1-96 through 3-28-96)
  - Correspondence from GMM to SVE and Clark Jones (IHI employee), as well as correspondence from FDB to SVE and from GMM to Dawn McIntyre and AW (A/CP)
  - 3-6-96 letter from GMM to Richard Corbin re: International Heritage, Inc. (A/CP)



- Correspondence 7 (2-6-96 through 2-28-96)
  - Correspondence during the above dates from GMM to SVE, AW, LS, CS, Derrick Rogers (IHI employee), Barry Ackle and Sabrina Wei, JB, DH, DA, all concerning IHI matters (A/CP)
- Correspondence 6 (12-1-95 through 1-31-96)
  - Correspondence from GMM to AW, JSH, SVE, DH, FDB, Sabrina Wei, JB, Clark Jones, Crystal Anderson of IHI, LS and CS (A/CP)
  - Correspondence from SVE to GMM regarding career kits updated for representatives (A/CP)
  - Draft document from GMM to SVE with handwritten notations by GMM (WP)
- Correspondence 5 (10-3-95 through 11-30-95)
  - Correspondence during the above dates from GMM to CS, SVE, Dawn McIntyre, Clark Jones (A/CP)
  - Correspondence from SVE to GMM (A/CP)
  - Correspondence from DA to GMM (A/CP)
  - Correspondence from Sheila of IHI to GMM (A/CP)
  - Also included are handwritten notes of GMM dated 10-9-95 concerning a conversation with CS (WP)
- Correspondence 4 (9-6-95 through 9-28-95)
  - Correspondence during the above time frame from Sally Oberman of Ragsdale Liggett to Sheila Stansill of IHI (A/CP)
  - Correspondence from GMM to Sheila Stansill, SVE, Thomas Applewhite, LS (A/CP)
  - Correspondence from DA to GMM (A/CP)
  - Draft document with handwritten notes by GMM which was sent to Sheila Stansill (IHI employee) (WP)
- Correspondence 3 (8-1-95 through 8-31-95)
  - Correspondence from the above dates from GMM to Sheila Stansill (IHI employee), CS and wife (A/CP)
  - Correspondence from Sheila Stansill (IHI employee) to GMM (A/CP)
  - Correspondence from DA to GMM, SVE (A/CP)
- Correspondence 2 (6-1-95 through 7-27-95)
  - Correspondence from SVE to FDB and GMM (A/CP)
  - Correspondence from GMM to SVE, Sheila Stansill, FDB, Jean Savage (A/CP)
  - Correspondence from FDB to SVE (A/CP)
  - Draft document from GMM with handwritten notes to IHI (WP)
- Correspondence 1 (4-28-95 through 5-31-95)



- Correspondence from SVE to GMM (A/CP)
- Correspondence from GMM to SVE, Jean Savage, Secretary of IHI, LS and CS (A/CP)
- Draft documents: one to Jack Smith Jr. with handwritten notes from GMM, another draft document sent to SVE from GMM with numerous handwritten notes from GMM (WP)

**BOX 96W342I 4**

- Meeting Proxy IHI 1996 Shareholders Meeting - Proxy Drafting.
  - 12-11-95 fax correspondence from KL Barnes to GMM (A/CP)
  - Handwritten draft documents from GMM and two draft documents which include numerous handwritten edits and notations from GMM related to Shareholder Meeting Proxy results (WP)
- July 1, 1996 Proxy
  - 6-26-96 fax communication from AW to GMM A/CP)
  - Computer generated shareholder lists with handwritten notations from GMM (WP)
- Proxy Project 08-1995
  - Correspondence from GMM to LS, SVE, DA, CS (A/CP)
  - Correspondence from DA to GMM, SVE (A/CP)
  - Draft articles of amendment with handwritten notes from GMM (WP)
  - Handwritten notes from GMM (WP)
  - Draft form entitled Proxy for Shareholder Action International Heritage Inc. vote to increase the number of authorized shares (WP)
  - Wyrick, Robbins working documents on floppy disk (WP)
- Rescission Offer
  - Correspondence from DA to SVE dated July 27th and August 4, 1995 (A/CP)
- Miscellaneous Documents
  - Draft documents including draft shareholder lists with handwritten and other notations from GMM (WP)
  - Handwritten shareholder list by GMM (WP)
  - A second shareholder list with handwritten notations by GMM (WP)
  - Correspondence from AS to GMM (A/CP)
  - Correspondence from GMM to SVE, AS, Gary Johnson, JB (A/CP)
  - Handwritten notes from GMM (WP)
  - A final correspondence from GMM to Sheila Stansill (IHI employee) (A/CP)

**BOX 96W342I 5**

- IHI Corporate Update

- Correspondence from SVE dated 3-29-96 to GMM (A/CP)
- Management Compensation Review Committee
  - Correspondence from GMM to Barry Ackle, Jimmy Knowles, CS, LS, SVE, Sabrina Wei and Davin Brown dated April 11, 1996 (A/CP)
  - Correspondence from GMM to SVE, the IHI Board of Directors, the Management Compensation Review Committee from February 26, 1996 (A/CP)
  - Handwritten notes of GMM from April 96 and February 96 (WP)
  - Draft documents from April 96 from GMM to SVE with handwritten notations of GMM (WP)
  - An employment agreement document from Pam of Eilers Jones Brown & McLeod to GMM (WP)
  - Correspondence dated 2-17-96 from Sabrina Wei to GMM (A/CP)
- IHI/Rudd/Hooks Memo of Understanding
  - Correspondence dated 7-9-96 from GMM to Jeff Hooks
  - Correspondence dated 5-1-96 from GMM to SVE, Ken Rudd and Jeff Hooks (A/CP)
  - Handwritten notes of GMM dated 4-24-96 (WP)
  - Handwritten notes of GMM dated 5-20-96 (WP)
  - Draft document entitled Memorandum of Understanding (WP)
- Miscellaneous Documents
  - Correspondence from GMM to SVE dated 4-8-96 (A/CP)
  - Ragsdale, Liggett & Foley document dated 11-8-95 and 9-8-95 (WP)
- Prologica Merger
  - Correspondence from GMM to RSH, SVE and from RSH to GMM and SVE from May, June, July of 96 (A/CP)
  - Correspondence from AW to GMM from May 3, 96 (A/CP)
  - Correspondence from FDB to SVE dated March 27, 96 (A/CP)
  - Handwritten notes from GMM dated 5-16-96 (WP)
  - Draft document entitled Merger Plan between IHI and Prologica International Inc with handwritten notes from GMM (WP)
  - Draft letter of intent to Prologica with numerous handwritten notes from GMM (WP)
  - A second draft merger plan and a second letter of intent draft (WP)
- IHI/Prologica Merger Corporate General Attorney Notes
  - Numerous pages of handwritten notes from GMM from March 27, 96 through 11-5-96 (WP)
- IHI/Prologica Merger Corporate General Bridge Ventures Consulting Agreement

- Correspondence from RSH to GMM and correspondence from GMM to SVE from May and July of 96 (A/CP)
- One page of handwritten notes from GMM dated 7-2-96 (WP)
- One draft Bridge Ventures Inc Consulting Agreement and one draft of same with handwritten notes from GMM (WP)
- IHI Prologica Merger Corporate General Cyndell & Company Consulting Agreement
  - Correspondence from GMM to SVE from March 96 (A/CP)
  - Correspondence from RSH to GMM from March 96 (A/CP)
  - Correspondence from GMM to RSH from March 96 (A/CP)
- Miscellaneous Documents
  - Correspondence from October 96 from GMM to SVE, November 95 from SVE to GMM (A/CP)
  - October 96 Sheila Stansill to GMM (A/CP)
  - Sept. 95 from GMM to SVE (A/CP)
  - Nov. 95 Sheila Stansill to GMM (A/CP)
  - Aug 95 from Martha Hutchens to Dottie Burch of the same firm (A/CP)
  - Numerous handwritten notes from GMM from August and Oct of 95 (WP)
  - August 95 eleven page fax from Susan Ballard to Sheila Stansill (A/CP)
- International Heritage Inc/Corporate General Billing/Expense Documents
  - Billing statements from Ragsdale Liggett & Foley and Wood & Francis to IHI (A/CP)

**BOX 96W342I 7**

- December 1995 Recession Offer Results
  - Correspondence from GMM to Clark Jones, SVE, KB and JB (A/CP)
  - Correspondence from DA to GMM from KB to GMM dated December 95 and January 96 (A/CP)
  - Draft documents dated December 15, 1995 – Rescission Offer (WP)
  - Shareholder list entitled IHI Rescission Offer dated December 15, 1995 which has minor notations from GMM (WP)
  - A list with handwritten notations from GMM (WP)
  - 12-13-95 draft entitled International Heritage Inc. Rescission Disclosure Circular with the numerous edits (WP)
  - Draft shareholder list entitled IHI Rescission Offer dated December 1995 labeled as a draft (WP)
  - 12-12-95 handwritten notes from GMM (WP)
  - Other handwritten notes from GMM (WP)
- Rescission Offer December 1995
  - Pages of handwritten lists from GMM labeled IHI Rescission November 1995 (WP)

- Draft document entitled Re International Heritage Inc. Rights to Shares of Common Stock with some handwritten edits from GMM (WP)
- Shareholder list labeled IHI Rescission offer December 1995 with handwritten edits from GMM (WP)
- Washington State Rescission Offer
  - Correspondence from GMM to FDB from March 1996 (A/CP)
  - Correspondence from AW to GMM from March 1996 (A/CP)
  - Handwritten notes from GMM (WP)
- Miscellaneous Documents
  - Correspondence from GMM to SVE, Clark Jones, DA, FDB, JK and SVE (A/CP)
  - Correspondence from DA to GMM which include significant attachments (A/CP)
  - All correspondence from January and February 1996 (A/CP)
  - Handwritten notes from GMM from December 1995
  - Other handwritten notes
  - Draft document entitled International Heritage Inc. Rescission Disclosure Circular (WP)

**BOX 96W342I 9**

- S-1 Registration Statement Blue Sky
  - Correspondence from GMM to SVE, RSH, JAB and FDB, Ms. Terri L. Shulman (A/CP)
  - Correspondence from DA to GMM, JAB to GMM, RSH to GMM, AW to GMM and RSH to Office of the Secretary of State Securities Division dated July 12, 1996 and from Terri L. Shulman to GMM. Except where noted, all correspondence ranges from August of 1996 through February of 1997 (A/CP)
  - Various pages of handwritten notes of GMM (WP)
- International Heritage, Inc. S-1 Registration Statement Drafting
  - Various drafts of the Securities and Exchange Commission Form S-1 for International Heritage, Inc. Some labeled draft documents, all bearing various handwritten notations from GMM. All from July 1996 (WP)
  - One International Heritage, Inc. shareholder list bearing handwritten notes from GMM (WP)
- International Heritage, Inc. Material for S-1 Amendment
  - Fax transmission from Clark A. Jones to GMM with handwritten notations from GMM (WP and A/CP)
  - Fax correspondence from RSH to GMM (A/CP)
  - Draft of International Heritage, Inc. Options Grants with numerous handwritten edits from GMM (WP)
- Except where noted above, all items are from August 1996

- Amendment 1 to Form S-1 Computer Draft
  - Draft of the Securities and Exchange Commission Amendment No. 1 to Form S-1 Registration Statement for International Heritage, Inc. and copies Corporation Edgar submission header worksheet v.4.4 partially filled out (WP)
- Miscellaneous Documents
  - Numerous drafts of the Securities and Exchange Commission Amendment No. 1 to Form S-1 for International Heritage, Inc. all bearing various handwritten notes from GMM and one facsimile transmission from Pamela Patrick, Senior Accountant, to GMM.
  - Handwritten notes of GMM included within these documents (WP)

**BOX 96W342I 10**

- Underwriter's Comments to Form S-1 IHI
  - Draft of Securities and Exchange Commission Amendment No. 2 to Form S-1 Registration Statement under Securities Act of 1933 for IHI dated January 30, 1997. This document includes handwritten notes from GMM and numerous edits (WP)
  - January 3, 1997 correspondence from KMS to GMM with attachment (A/CP)
  - January 23, 1997 correspondence to GMM from Steve Wolosky with attachment which also contains numerous handwritten notes of either Wolosky or GMM (A/CP)
- IHI Amendment No. 2 to Form S-1 Drafting number 2
  - 03-04-97 draft letter to Becky Boland with comments from EJBm (WP)
  - Six drafts of the Securities and Exchange Commission Amendment No. 2 to Forms S-1 Registration Statement for IHI – each bearing handwritten notations from GMM (WP)
  - 02-17-97 draft letter from GMM to prospective investors with numerous handwritten notations from GMM and edits (WP)
  - 2-10-97 correspondence from GMM to Steve Wolosky (A/CP)
  - 2-7-97 correspondence from Jonathan Nieman to GMM ?
  - 1-30-97 draft letter to Becky Boland bearing numerous handwritten notations and edits of GMM (WP)
  - 2-3-97 correspondence from GMM to RSH with enclosures bearing handwritten notations and edits from GMM (A/CP)
  - 1-31-97 correspondence from GMM to Robert Norris of Wisheart, Norris, Henninger & Pittman (A/CP)
  - 1-22-97 memorandum from GMM to IHI executive managers (A/CP)
  - 1-21-97 memorandum from GMM to executive management of IHI regarding Amendment No. 2 to the S-1 Registration Statement (A/CP)
  - 1-26-97 memorandum from GMM to SVE regarding Amendment No. 2 to the S-1 Registration Statement (A/CP)
  - 1-26-97 memorandum from GMM to SVE regarding Amendment No. 2 to the S-1 Registration Statement. This document bears numerous handwritten notes of GMM and has an attachment (A/CP)

- Draft document entitled Preliminary Prospective dated January 30, 1997 International Heritage, Inc. bearing numerous handwritten notations from EJBM (WP)
- 1-22-97 handwritten letter from Stephanie Harris to GMM regarding responses to SEC comments (WP)
- 1-23-97 memorandum from DM to GMM (A/CP)
- 1-22-97 memorandum from GMM to executive management of IHI regarding Amendment No. 2 to the S-1 Registration Statement (A/CP)
- 1-20-96 document from Clark Jones entitled Comments and Feedback S-1 Amendment No. 2 (A/CP)
- 1-30-97 draft letter to Becky Boland bearing handwritten notations from GMM (WP)
- 1-21-97 fax from Clark Jones to GMM regarding S-1 comments (A/CP)
- 1-20-97 IHI fax from Clark Jones to GMM regarding S-1 Am-2 comments (A/CP)
- 1-20-97 executive management's comments to S-1 draft bearing handwritten notations from GMM (WP)
- 1-21-97 fax correspondence from RSH to GMM (A/CP)
- 1-17-97 correspondence from GMM to Steve Bayern, Barry Hawke, Davin Brown, RSH, Patrick Kolenick, Pat Patrick, SVE, Steven Wolosky, Aram Kostiglian, entitled International Heritage, Inc. Amendment No. 2 Form S-1 with attachment (A/CP)
- International Heritage, Inc. Management Responses to SEC Comments
  - 1-9-97 fax correspondence from Clark Jones to GMM re: S-1 A-2 (A/CP)
  - 11-22-96 fax correspondence from Jeff Hooks to GMM re: SEC comments (A/CP)
  - 1-2-97 fax transmission from Clark Jones to GMM re: S-1 Am 2 (A/CP)
  - 12-20-96 fax transmission from Clark Jones to GMM re: S-1 comments (A/CP)
  - 12-31-96 fax transmission from DM to GMM re: SEC comments and SVE request (A/CP)
  - 11-19-96 memorandum from GMM to JB re: comments to SEC comment letter question number 13 (A/CP)
  - 11-17-96 memorandum from Jeff Trendle (IHI employee) to GMM re: SEC comment # 12 (A/CP)
- Management Responses to S-1 1-15-97
  - 1-15-97 handwritten memorandum from Stephani Harris regarding comments prospectus (WP)
  - Copy of handwritten comments from JB with handwritten notations from GMM (WP)
  - 1-16-97 fax transmission from AS to GMM regarding S-1 comments of JB and Clark Jones (A/CP)
  - 1-13-97 draft of the Securities and Exchange Commission Amendment No. 2 to Form S-1 Registration Statement for International Heritage, Inc. (WP)
  - 1-15-97 fax transmission from EJBM to GMM with numerous handwritten notations and edits from AS, Pam Patrick and GMM (WP)
  - 1-14-97 handwritten notes and comments to S-1 Amendment No. 2, attached to Amendment No. 2 to Form S-1 draft (WP)
  - 1-14-96 comments and feedback S-1 Amendment No. 2 from Clark Jones with handwritten notations (WP)
  - 1-15-97 comments to the Amendment to S-1 from DH (WP)

- handwritten prospectus summary from Jeff Hooks (IHI employee) (WP)
- 11-17-96 memorandum from Jeff Trendle to GMM with handwritten notations from GMM (WP)
- Fax transmission to AS from Ken Rudd (IHI employee), no date, regarding notes on S-1 (A/CP) (WP)
- Draft document regarding income taxes from Mary Breen bearing numerous handwritten edits but no date (WP)
- Handwritten comments on Amendment No. 2 from DM with some handwritten comments from GMM (WP)
- 1-15-97 memo from Mike Russo to AS (A/CP)
- 1-15-97 handwritten memorandum from SVE to GMM labeled additional S-1 comments (A/CP)
- 1-16-97 fax transmission from Clark Jones to GMM entitled S-1 Comments Director Commissions (A/CP)
- IHI Amendment No. 2 Form S-1 drafting Number 1
  - Five drafts of the Securities and Exchange Commission Amendment No. 2 to Form S-1 Registration Statement for International Heritage, Inc. – each one bearing numerous handwritten notes of GMM and handwritten edits from GMM (WP)
  - 1-17-97 draft letter to Becky Boland (WP)
  - 1-14-97 preliminary draft of IHI Consolidated Financial Statements and supplemental information period ending October 31, 1996 and December 31, 1995 (WP)
  - 1-13-97 preliminary draft of same with note from EBJM to GMM bearing numerous handwritten notes from GMM (WP)
  - 12-15-95 shareholder list entitled IHI Rescission Offer bearing handwritten notations (WP)
  - 10-18-96 facsimile transmission from Rebecca A. Bohland to GMM re: comments on International Heritage's form S-1. This document bears numerous handwritten notes from GMM (WP)
  - 11-20-96 draft letter to Becky Bohland with handwritten notes and edits from GMM (WP)
  - 11-21-96 facsimile transmission from Clark Jones to GMM re: S-1 Am 2 memos (A/CP)
  - 11-25-96 correspondence from Steve Wolosky to GMM re: IHI with Amendment No. 2 to Form S-1 enclosed (A/CP)
  - Floppy diskette from Olsen Grunderman, Frome and Rosenzweig, LLP (WP)

**BOX 96W342I 12**

- Miscellaneous Documents
  - Facsimile transmission from March 24, 1997 from Allen Berkeley of Kirk Patrick & Lockhart to GMM (A/CP)
  - Facsimile transmission from March 17, 1997 from Allen Berkeley of Kirk Patrick & Lockhart to GMM (A/CP)
  - Correspondence from CTF to IHI September 3, 1996 (A/CP)
  - Facsimile correspondence from RSH to GMM dated 8-12-96 (A/CP)



- Draft letter to IHI shareholder and/or option holder to GMM from AS with numerous handwritten notations from GMM (WP)
- Handwritten notes from GMM attached to IHI audio cassette entitled "Come Grow with Us" (WP)
- SEC Inquiry 02/17 Letter
  - Correspondence from GMM to Becky Boland of the Securities and Exchange Commission, Washington DC dated March 21, 1997 (A/CP)
  - Correspondence from AW to GMM (A/CP)
  - Correspondence from GMM to RSH, Allen Berkeley, Steven Wolosky and SVE (A/CP)
  - 3/21/97 correspondence from GMM to RSH, Allen Berkeley and Steven Wolosky with heavy handwritten notations from GMM (A/CP)
  - Draft letter from SVE to GMM with handwritten notations from GMM (WP)
  - Correspondence from Allen Berkeley to GMM from 3-18-97 (A/CP)
  - Memo from GMM to SVE, from GMM to RSH, to Steven Wolosky (A/CP)
  - Correspondence from Linda Halstead to GMM and from RSH to GMM, from RSH to SVE and from Steven Wolosky to GMM (A/CP)
  - Drafts of: letter to Becky Boland, February 17, 1997 letter to prospective investors bearing heavy handwritten notations from GMM; numerous pages of handwritten notes from GMM; legal research by GMM – all documents appear to be from March 1997 (WP)

**BOX 96W342I 14**

- 7-2-97 communication from GMM to Steven Wolosky and Al Barbera with numerous reports and IHI documents attached (A/CP)
- 3-25-97 facsimile transmission from GMM to RSH with handwritten notes of GMM attached (A/CP)
- 4-2-97 memorandum from KMS to GMM with handwritten notes of GMM attached (A/CP)
- 4-3-97 memorandum from GMM to SVE and JB (A/CP)
- 4-10-97 handwritten notes from GMM (WP)
- 4-11-97 Securities Issuer Questionnaire with handwritten notes possibly from SVE and filled out by SVE \*
- 7-31-96 IHI Stock Options Conditional Shares list with numerous handwritten notes by GMM (WP)
- Draft prospectus with numerous handwritten notes by GMM (WP)
- 5-16-97 memorandum from GMM to IHI management (A/CP)
- 5-13-97 draft of Securities and Exchange Commission Amendment No. 3 to Forms S-1 for International Heritage, Inc. with numerous apparent edits from Eilers, Jones, Brown & McLeod (WP)
- Drafts documents included consisting of Securities and Exchange Commission Amendment No. 3 to Form S-1 for International Heritage, Inc. May 1997 with extensive revisions and notes from GMM (WP)
- Numerous shareholder/option holder lists all with various notations from GMM (WP)
- Draft letter from SVE to RSH, Davin Brown and Richard Eisener & Company, May 6, 1997 (WP)

- Correspondence from GMM to AS and same from May 8<sup>th</sup> correspondence from GMM to AS (A/CP)
- Throughout these documents are numerous pages of handwritten notes from GMM (WP)

**BOX 96W342I 17**

- This box is privileged in its entirety as it pertains to business and litigation matters completely outside of and beyond the scope of International Heritage and SVE. A review of the entire contents of this box revealed that there is only one document to, from or about International Heritage dated February 28, 1997 from office manager Cathy Cruise to Master Communications Specialist regarding service provided to IHI by Master Page Communications Specialist. This document has been marked with a pink post-it for later identification \*

**BOX 96W342I 056**

- IHI – Southeastern Merchant Systems, Inc. Agreement
  - 10-7-97 handwritten notes of GMM (WP)
  - 9-24-97 facsimile correspondence from GMM to Keith Mackey, Controller, IHI (A/CP)
  - 9-24-97 handwritten notes of GMM (WP)
  - 9-23-97 facsimile correspondence from GMM to Keith Mackey (A/CP)
  - 9-22-97 handwritten notes of GMM (WP)
  - 9-19-97 memorandum from GMM to Keith Mackey (A/CP)
  - 9-19-97 facsimile correspondence from GMM to Keith Mackey (A/CP)
  - 9-18-97 handwritten notes from GMM (WP)
  - 9-18-97 facsimile transmission from Keith Mackey to GMM (A/CP)
- Speer Communications, Inc.
  - Draft non-disclosure agreement with numerous notes and handwritten edits from GMM (WP)
  - 8-20-98 handwritten notes of GMM (WP)
  - 8-4-98 handwritten notes of GMM (WP)
  - Draft Speer Communications, Inc. Authorized Dealer Agreement with numerous handwritten notes and edits of GMM (WP)
- Specialty Atlanta, Inc.
  - 10-6-98 email transmission from DM to GMM (A/CP)
  - 5-27-97 correspondence from GMM to DM (A/CP)
  - Draft Inventory Management and Fulfillment Services Agreement with handwritten notes and edits from GMM (WP)
  - Second draft Inventory Management and Fulfillment Services Agreement with numerous additional handwritten edits and corrections from GMM (WP)
- Stikeman, Graham and Keeley

- 9-22-98 document regarding legal fees and expenses for International Heritage of Canada, Inc. by GMM (A/CP)
- 8-28-98 document regarding legal fees and expenses for IHI by GMM (A/CP)
- 9-11-98 letter from Robert Stikeman to IHI attn: SVE with attachment (A/CP)
- 6-29-98 memorandum from GMM to CR regarding Stikeman, Graham and Keeley (A/CP)
- Subpoenas
  - 9-9-97 handwritten notes from GMM (WP)
  - 10-20-98 facsimile correspondence from CR to BEW (A/CP)
  - 8-22-97 handwritten notes from GMM (WP)
  - 8-26-97 handwritten notes from GMM (WP)
  - 8-18-97 facsimile transmission from Pete Scanlon to GMM with handwritten notes of GMM attached (A/CP)
  - 9-18-97 memorandum from GMM to case file regarding IHI subpoena in criminal case US v. McGhee (WP)
- Trademark application
  - 1-8-97 correspondence from GMM to SVE (A/CP)
  - 3-24-97 handwritten notes of GMM (WP)
  - 3-14-97 draft letter to Assistant Commissioner of Trademarks, Hope East Slonim, bearing numerous handwritten notes and remarks from GMM and handwritten notes from GMM attached (WP)
  - 3-10-97 facsimile correspondence from Linda Halstead to GMM (A/CP)
  - 6-12-96 correspondence from GMM to AW (A/CP)
  - Miscellaneous handwritten notes from GMM (WP)
  - 6-12-96 facsimile transmission from GMM to AW (A/CP)
  - 4-12-96 memorandum from AW to GMM (A/CP)
  - 4-1-96 correspondence from GMM to AW and DM (A/CP)
  - 4-2-96 facsimile correspondence from GMM to AW and DM (A/CP)
  - Miscellaneous notes of GMM (WP)
  - Miscellaneous document instructing IHI with regard to specific needs for federal registration of trademark and/or service marks with handwritten notes of GMM attached (WP)
  - Draft application for trademark or service mark partially completed (WP)
  - Miscellaneous document containing IHI standard information with handwritten notes and edits from GMM (WP)
  - Second miscellaneous document with IHI corporate information and bearing handwritten notes and edits from possibly GMM (WP)
  - Two miscellaneous handwritten documents, one: notes from GMM, two: a note from Debbie to GMM (A/CP) (WP)
  - Miscellaneous informational document from Secretary of State regarding classification of goods and services provided with note to GMM and additional handwritten notes (WP)
  - 7-28-95 handwritten notes (WP)
  - 9-9-97 correspondence from GMM to DM (A/CP)
  - Eye Care Brochure with handwritten note from CR to GMM (WP)

- Search and research of trademark information by possibly GMM (WP)
- Miscellaneous note from GMM (WP)
- Several trademark, service mark applications for Heritage Essentials, Essentials of Tomorrow and Ultra Food, each partially filled out by GMM (WP)
- 2-3-98 facsimile correspondence from JAB to CR (A/CP)
- 1-23-98 handwritten notes from GMM (WP)
- 1-7-98 memorandum from GMM to DM cc'd to Brent Miller (A/CP)
- 2021 Interactive, LLC/IHI
  - 10-13-97 facsimile correspondence from GMM to GMM (A/CP)
  - 10-13-97 facsimile correspondence from GMM to Patrick Hendrickson of Curtin & McConkie (A/CP)
  - Draft non-disclosure agreement with some notations and corrections by GMM (WP)
  - 10-7-97 handwritten notes by GMM (WP)
  - Draft 2021 Interactive, LLC License Agreement with some corrections and edits by GMM with handwritten edits attached from GMM (WP)
  - 9-8-97 GMM draft work copy of 2021 Interactive, LLC License Agreement (WP)
  - 9-8-97 GMM work copy of addendum to 2021 Interactive, LLC License Agreement (WP)
  - 6-10-97 facsimile correspondence from GMM to Kevin Jones (A/CP)
  - 5-28-97 facsimile correspondence from Janet to Kevin Jones with draft License Agreement attached (A/CP)
  - 5-2-97 facsimile correspondence from GMM to Kevin Jones & DH (A/CP)
  - 4-20-97 facsimile correspondence from GMM to Kevin Jones, DH & JB (A/CP)
  - 9-8-97 handwritten notes of GMM (WP)
  - Miscellaneous handwritten notes of GMM (WP)
- Miscellaneous Notes
  - One page of handwritten notes of GMM (WP)
  - Miscellaneous interoffice memorandum from CR and Peter Scanlon to SVE and cc'd to GMM, JB, Ken Rudd, Gary Raser, BEW (A/CP)
  - 5-6-98 handwritten notes of GMM (WP)
  - email transmission from Michael Decker to Ashley Markham w/ handwritten notes front and back (WP)
  - Draft distribution and license agreement between IHI and Tyra International with handwritten notations and edits from GMM and inserts attached (WP)
  - 2-18-98 facsimile correspondence from Steven Ellick of Tucker, Flier and Lewis to GMM re: Tyra International, Inc./International Heritage, Inc. with draft distribution and license agreement attached bearing numerous handwritten notations and edits from GMM (A/CP)
  - 2-18-98 facsimile correspondence from Steven Ellick of Tucker, Flier and Lewis to GMM re: Tyra International, Inc./International Heritage, Inc. with draft distribution and license agreement attached bearing numerous handwritten notations and edits from CR (A/CP)
  - 1995 draft document entitled Chromax Europe Limited and Quorum International UK Limited Agreement with various handwritten notations throughout (WP)

- Miscellaneous pages of handwritten notes from GMM (WP)
- undated Outlook address from Andrea Norton for Tom Karam (WP)
- 1-16-98 draft Memorandum of Understanding bearing edits and handwritten notations from GMM (WP)
- Second draft of Memorandum of Understanding between IHI and Tyra International with no edits (WP)
- Third draft of Memorandum of Understanding between IHI and Tyra International with handwritten notes and edits from GMM (WP)
- Miscellaneous
  - 11-5-97 memorandum from GMM to Rich Cicha, IHI employee (A/CP)
  - 10-16-97 letter from RW Corbin Insurance Agency to JB forwarded to GMM by JB with note on front (A/CP)
  - 12-5-97 memorandum from GMM to SVE, JB, Derrick Stryker, Kevin Jones and DH (A/CP)
  - Draft agreement between IHI and International Heritage of Canada, Inc. with some edits and corrections (WP)
  - 11-20-97 memorandum from GMM to DH, Kevin Jones, Derrick Stryker (A/CP)
  - Second draft of agreement between IHI and International Heritage of Canada, Inc. with no apparent edits (WP)
  - 11-20-97 facsimile transmission from GMM to Bob Chalmers of IHI (A/CP)
  - 11-26-97 memorandum from GMM to Derrick Stryker, DH, Kevin Jones, JB, SVE (A/CP)
  - 11-20-97 memorandum from GMM to DH, Kevin Jones, Derrick Stryker (A/CP)
  - 11-24-97 handwritten notes of GMM (WP)
  - 11-17-97 handwritten notes of GMM (WP)

**BOX 96W342I 060**

- Miscellaneous Documents
  - 3-5-98 email copy of transmission from GMM to Executive Management; Marketing; Compliance (A/CP)
  - 2-24-98 facsimile transmission from LWB to GMM (A/CP)
  - 3-2-98 facsimile transmission from LWB to GMM and RSH (A/CP)
  - 3-2-98 facsimile transmission from LWB to GMM with draft of agreement and plan of reorganization between Kara International and IHI attached (A/CP)
  - 4-1-98 IHI shareholder list with numerous handwritten edits and notations (WP)
- Documents relating to Draft of Form D
  - 3-22-98 written notation on file from GMM to AS/Linda Halstead (WP)
  - 3-25-98 handwritten document entitled Blue Sky filing fees by GMM with attachments (WP)
  - 3-25-98 handwritten document entitled Blue Sky filing fees by GMM with additional attachments of letters from IHI to various shareholders (WP)
  - 6-4-98 correspondence from GMM to Eugene J. Stroz with enclosures (A/CP)

- Miscellaneous handwritten notes regarding second registration (WP)
- IHI list labeled Exhibit C bearing various handwritten notations (WP)
- 3-23-98 IHI list with numerous handwritten notes (WP)
- Form D draft with handwritten entries and handwritten notations from GMM to AS and Linda Halstead (WP)
- New York Form 99
  - 4-17-98 correspondence from GMM to RSH with enclosures all regarding State of New York Form 99 for IHI (A/CP)

**BOX 96W342I 061**

- Handwritten note from GMM (WP)
- 11-17-97 correspondence from GMM to RSH (A/CP)
- 12-13-97 correspondence from Etablissement purle Placement Prive to GMM with handwritten post-it attached (A/CP)
- Miscellaneous handwritten notes on graph paper (WP)
- 7-1-98 memorandum from GMM to JB and Robert Hukezalie (A/CP)
- 4-21-98 handwritten notes from GMM (WP)
- draft of Schedule A attachment with some GMM handwritten notation and GMM handwritten chart attached (WP)
- 6-18-98 memorandum from GMM to SVE (A/CP)
- 6-18-98 facsimile correspondence from GMM to Judith for Herbert (A/CP)
- 6-19-98 memorandum from GMM to SVE (A/CP)
- 6-22-98 memorandum from GMM to Board of Directors (A/CP)
- 7-7-98 facsimile correspondence from Royal Bank of Canada to GMM with handwritten notes from GMM on the front (A/CP)
- 7-15-98 handwritten notes by GMM (WP)
- 6-19-98 letter from GMM to Herbert Towning with handwritten note of GMM attached (WP)
- 6-16-98 letter from GMM to Curt Hughes with handwritten notes of GMM attached (WP)
- 8-10-98 correspondence from GMM to Brown, Brothers, Harriman & Co. with handwritten note of GMM attached (WP)

**BOX 96W342I 062**

- Marsh v. IHI Deposition of IHI (July 29-30, 1998) (Copy provided)
  - 8-20-98 correspondence from BEW to CR and JB with attachments consisting of July 29 and 30<sup>th</sup> deposition with attached exhibits (A/CP)
- Liebendorfer v. IHI
  - 10-22-98 facsimile correspondence from Susan Halpern to GMM (A/CP)
  - 10-5-98 handwritten notes of GMM (WP)
  - 7-22-98 facsimile correspondence from BML to GMM (A/CP)
  - 10-6-98 GMM copy of email transmission from GMM to Kevin Jones (A/CP)



- 7-22-98 facsimile correspondence from BML to GMM (A/CP)
- 9-29-98 GMM copy of facsimile transmission from BEW to GMM (A/CP)
- 10-19-98 correspondence from GMM to Susan Halpern with attachment (A/CP)
- 9-17-98 facsimile correspondence from James Henry Jr. to DH (A/CP)
- 7-29-98 correspondence from BEW to GMM (A/CP)
- 5-28-98 facsimile correspondence from GMM to Douglas Lang (A/CP)
- 5-28-98 correspondence from GMM to Douglas Lang (A/CP)
- 4-6-98 correspondence from GMM to RB (A/CP)
- 4-10-98 facsimile transmission from GMM to BEW (A/CP)
- 4-29-98 correspondence from Douglas Lang to BEW with attachment (A/CP)
- 4-7-98 correspondence from GMM to BEW with attachments(A/CP)
- 5-1-98 correspondence from James Henry to BEW (A/CP)
- Work-Product
  - Handwritten notes of GMM (WP)
  - 7-17-98 correspondence from GMM to MV and BEW with substantial attachments and also labeled attorney-work product (A/CP)
  - 7-27-98 IHI memorandum from Kevin Jones to GMM with cc'd to Robyn Land (A/CP)
  - 7-17-98 correspondence from GMM to MV and BEW labeled attorney work-product (A/CP)
  - 7-10-98 IHI memorandum from GMM to DH, Kevin Jones, Ashley Markum, Dawn McIntyre and cc'd to JB (A/CP)
  - 7-9-98 handwritten notes of GMM (WP)
  - 9-16-98 correspondence from BEW to GMM (A/CP)
  - 8-11-98 correspondence from BEW to GMM (A/CP)
  - 8-11-98 correspondence from BEW to BML & Susan Halpern (A/CP)
  - 8-19-98 GMM copy of email transmission from DH to GMM (A/CP)
  - 7-27-98 correspondence from GMM to BEW (A/CP)
  - 7-27-98 IHI memo from Kevin Jones to GMM cc'd Robyn Land (A/CP)
  - 7-24-98 handwritten notes of GMM (WP)
  - 7-29-98 correspondence from BEW to GMM marked attorney-client privileged (A/CP)
  - 7-28-98 correspondence from BEW to GMM with attachments (A/CP)
  - 7-27-98 correspondence from GMM to BEW with attachments (A/CP)
  - 7-23-98 IHI memo from GMM to JB and CR (A/CP)
  - 7-21-98 handwritten notes of GMM (WP)
  - 7-22-98 correspondence from GMM to Susan Halpern (A/CP)
  - 7-23-98 IHI memo GMM to JB and CR (A/CP)
  - 7-21-98 GMM copy of email transmission from MV to GMM cc'd BEW with handwritten notes of GMM (A/CP)
  - 7-10-98 IHI memo from GMM to DH, Kevin Jones , Ashley Markum, Dawn McIntyre, cc'd JB (A/CP)
  - 7-2-98 facsimile correspondence from BEW to GMM (A/CP)
  - 5-6-98 correspondence from BEW to BML (A/CP)
  - 5-28-98 facsimile correspondence from GMM to Douglas Lang (A/CP)
  - 5-28-98 correspondence from GMM to Douglas Lang (A/CP)
  - 5-11-98 correspondence from GMM to BEW with attachment (A/CP)
  - 5-1-98 facsimile correspondence from BEW to GMM (A/CP)



- 4-3-98 correspondence from GMM to BEW (A/CP)
- 4-6-98 correspondence from GMM to RB (A/CP)
- Marsh et al v. IHI
  - 9-17-98 facsimile correspondence from James Henry to DH (A/CP)
  - 7-22-98 facsimile correspondence from MV to GMM (A/CP)
  - 7-24-98 facsimile correspondence from GMM to Sue Halpern (A/CP)
  - 7-22-98 facsimile correspondence from MV to GMM (A/CP)
  - 7-17-98 correspondence from GMM to MV and BEW marked attorney-work product (A/CP)
  - 7-15-98 IHI memo from Ashley Markum to GMM (A/CP)
  - 7-10-98 IHI memorandum from GMM to DH, Kevin Jones, Ashely Markum, Dawn McIntyre cc'd JB (A/CP)
  - 7-9-98 handwritten notes of GMM (WP)
  - 7-1-98 facsimile correspondence from BEW to GMM (A/CP)
  - 6-11-98 copy of correspondence from James Russell Tucker to James Henry and BEW with handwritten notes from MV to DH and yellow post-it with handwritten notes both attached (A/CP)
- Meckenstock v. IHI
  - 6-1-98 handwritten notes of GMM (WP)
  - 10-15-98 correspondence from BEW to BML with attachment (A/CP)
  - 8-24-98 correspondence from BEW to MV (A/CP)
  - 7-28-98 correspondence from BEW to BML with attachment (A/CP)
  - 7-27-98 facsimile correspondence from BEW to BML (A/CP)
  - 4-6-98 correspondence from GMM to RB (A/CP)
  - 3-26-98 facsimile correspondence from AW to John Halebian (A/CP)
- Unique Opportunities v. International Heritage, Inc.
  - 9-22-98;10-7-98 handwritten notes of GMM (WP)
- Class Action Correspondence
  - 7-29-98 correspondence from BEW to GMM (A/CP)
  - 6-10-98 correspondence from GMM to BML with attachments (A/CP)
  - 6-3-98 correspondence from GMM to BML (A/CP)
  - 5-15-98 correspondence from GMM to BML (A/CP)
  - 5-14-98 correspondence from James Wardrick, Jr. of Kutak Rock to BML (A/CP)
  - 5-5-98 correspondence from BEW to GMM via facsimile (A/CP)
  - 4-14-98 correspondence from BEW to Theodore Sonde of Dechert, Price and Rhoads (A/CP)
  - 4-27-98 draft Montana statement (WP)
  - 4-14-98 correspondence from BEW to Doug Atkins of Gardere & Wynn, LLP (A/CP)
  - 4-15-98 correspondence from BEW to John B. Missing of Brobeck, Phleger & Harrison, LLP (A/CP)

- 4-16-98 correspondence from GMM to BEW with enclosures (A/CP)
- 5-8-98 correspondence from BML to GMM (A/CP)
- 4-16-98 facsimile correspondence from GMM to RB, John Missing (A/CP)
- 4-15-98 facsimile correspondence from GMM to RB, John Missing (A/CP)
- Dechert, Price and Rhoads Engagement Letter
  - 6-9-98 correspondence from GMM to Depository Trust Corp. re: International Heritage Incorporated with handwritten note of GMM attached (A/CP) (WP)
  - 5-15-98 correspondence from GMM to BML (A/CP)
  - 5-12-98 correspondence from BML to SVE (A/CP)
  - Brochure of Brobeck, Phleger & Harrison, LLP with 3-30-98 letter from John Missing to GMM within (A/CP)
- William Swinney and Marshall Reddy v. Van Etten et al. (Wake County NC, File No. 98 CVS 04277)
  - 7-1-98 correspondence from BEW to GMM (A/CP)
  - 7-1-98 GMM copy of email transmission from DH to Mike Russo (A/CP)
  - 6-23-98 facsimile transmission from GMM to BML (A/CP)
  - Internal class action information sheet regarding Swinney class action (WP)
  - Internal class action information sheet regarding Marshall Reddy (WP)
- Miscellaneous Documents
  - 4-12-99 correspondence from SMH to BEW (A/CP)

**BOX I6W342I 063**

- Miscellaneous Documents
  - 5-8-98 copy of correspondence from Joe Matthews to GMM with handwritten notes from GMM on yellow post-its attached (A/CP) (WP)
  - Draft information statement Kara International Inc. with handwritten notes and edits from GMM (WP)
  - 2-13-98 facsimile correspondence from LWB to GMM and David Nemelka (A/CP)
  - 2-13-98 second facsimile transmission from LWB to GMM and David Nemelka (A/CP)
  - 2-13 facsimile correspondence from GMM to LWB (A/CP)
  - 2-13-98 draft agreement and plan of organization with handwritten notes from GMM (WP)
  - Legal research regarding substitution of stock options (WP)
  - 2-11-98 facsimile correspondence from GMM to LWB (A/CP)
  - 2-12-98 facsimile correspondence from GMM to David Nemelka, Jr. and Sr., Gary McAdam, Michael Wolosky, RB, BEW, FDB, RSH cc'd SVE & JB (A/CP)
  - 2-11-98 second facsimile transmission from GMM to David Nemelka, Jr. and Sr., Gary McAdam, Michael Wolosky, RB, BEW, FDB, RSH cc'd SVE & JB (A/CP)
  - Confidential document file of GMM labeled Kara International, Inc. and International Heritage, Inc. transaction check list (WP)

- Miscellaneous draft document bearing handwritten notes of GMM 2 pages (WP)
- 2-11-98 facsimile correspondence from GMM to LWB cc'd RSH (A/CP)
- 2-10-98 correspondence from GMM to LWB cc'd David Nemelka (A/CP)
- 2-11-98 facsimile correspondence from RSH to GMM (A/CP)
- Draft document entitled Important Information for Shareholders of International Heritage, Inc. bearing handwritten notes and edits from GMM (WP)
- Draft of document entitled International Heritage, Inc. Capitalization as of 31 December 1997, also stamped confidential (WP)
- Draft of document entitled Important Information for Shareholders of International Heritage, Inc. also stamped confidential (WP)
- Draft of document labeled Information Statement Kara International, Inc. also stamped confidential (WP)
- Confidential document entitled Kara International, Inc. and International Heritage, Inc. transaction check list which happens to be a GMM document from her computer directory (WP)
- Draft letter from David Nemelka to SVE (WP)
- Draft of document entitled Agreement and Plan of Reorganization (WP)
- Copy of draft document entitled Information Statement Kara International, Inc., stamped confidential and bearing handwritten notes and edits from GMM (WP)
- 1-23-98 facsimile correspondence from GMM to David Nemelka, LWB & RSH cc'd SVE, JB, Mark Burgess, Eric Banas (A/CP)
- 2-23-98 copy of page 1 shareholders listing with yellow post-it note from GMM (WP)
- 3-4-98 facsimile correspondence from GMM to LWB (A/CP)
- March 1998 calendar print out of GMM (A/CP)
- 2-24-98 IHI memorandum from AW to LWB (A/CP)
- 2-24-98 IHI memo from AW to RSH cc'd GMM (A/CP)
- 2-19-98 GMM copy of email transmission from Linda Halsteadt to GMM (A/CP)
- 2-23-98 facsimile correspondence from RSH to GMM (A/CP)
- 2-19-98 facsimile transmission from GMM to LWB (A/CP)
- 2-18-98 facsimile correspondence from GMM to LWB (A/CP)
- 2-16-98 facsimile correspondence from LWB to GMM (A/CP)
- 2-16-98 GMM copy of email transmission from Linda Halsteadt to GMM (A/CP)
- 2-16-98 facsimile correspondence from GMM to LWB (A/CP)
- 2-16-98 facsimile correspondence from LWB to GMM (A/CP)
- 5-12-98 handwritten notes of GMM (WP)
- 5-20-98 facsimile correspondence from LWB to GMM (A/CP)
- 5-20-98 facsimile correspondence from GMM to Shelly at LWBs office (A/CP)
- 5-19-98 correspondence from GMM to LWB (A/CP)
- 3-16-98 GMM copy of email transmission from Marks Lang to everyone (A/CP)
- Miscellaneous handwritten notes of GMM (WP)
- 3-13-98 handwritten notes of GMM (WP)
- 8-K 3-6-98 Draft (folder) (WP)
  - Draft news release from LWB (WP)
  - Copy of Certificate of Amendment to the Articles of Incorporation of Kara International, Inc. (WP)
  - Draft Securities and Exchange Commission Form 8-K Current Report for International Heritage, Incorporated dated March 6, 1998 (WP)
- 4-13-98 correspondence from GMM to LWB cc'd RB, RSH & BEW (A/CP)

- 4-9-98 correspondence from LWB to GMM w/ significant attachments (A/CP)
- 8-13-98 facsimile correspondence from GMM to Brandon Burningham (A/CP)
- 8-14-98 correspondence from GMM to Brandon Burningham (A/CP)
- 8-14-98 three facsimile correspondence from GMM to Terry Jackson (A/CP)
- Copy of newspaper clipping with handwritten note from Marks to GMM (WP)
- 8-13-98 facsimile correspondence from GMM to Brandon Burningham (A/CP)
- 8-13-98 draft document entitled Immediate Press Release (WP)
- 8-13-98 draft document entitled Immediate Press Release with minor handwritten notes of GMM (WP)
- 8-13-98 draft Securities and Exchange Commission Form 10-QSB for IHI with handwritten notes (WP)
- 8-12-98 facsimile correspondence from GMM to Shelly at LWBs office (A/CP)
- 8-12-98 draft Securities and Exchange Commission Form 10-QSB with handwritten notes and edits from GMM (WP)
- 8-11-98 draft of document entitled International Heritage, Incorporated Condensed Consolidated Balance Sheet bearing handwritten notes (WP)
- Draft document entitled International Heritage, Incorporated Condensed Consolidated Balance Sheets bearing handwritten notes of GMM (WP)
- 6-30-98 document entitled International Heritage, Incorporated Notes to Condensed Consolidated Financial Statements with handwritten notes on yellow post-it from RB to GMM attached (WP)
- 8-5-98 handwritten notes of GMM (WP)
- Miscellaneous handwritten notes of GMM (WP)

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- Miscellaneous Documents
  - 7-16-98 correspondence from FDB to CR (A/CP)
  - 5-7-98 handwritten notes of GMM (WP)
  - 5-8-98 handwritten notes of GMM (WP)
  - 4-28-98 facsimile correspondence from GMM to BEW & FDB (A/CP)
  - 4-20-98 facsimile correspondence from GMM to SVE & BEW (A/CP)
  - 5-4-98 handwritten notes of GMM (WP)
  - 4-17-98 IHI memo from GMM to SVE, CR, BEW, FDB, RB & labeled confidential attorney-work product (A/CP)
  - 4-17-98 handwritten notes of GMM (WP)
  - 5-4-98 handwritten notes of GMM (WP)
  - 4-3-98 facsimile correspondence from GMM to BEW (A/CP)
  - 4-3-98 facsimile correspondence from GMM to BEW (A/CP)
- Silcott v. SVE, IHI
  - 6-18-98 IHI memo from GMM to CR (A/CP)
- Miscellaneous Documents
  - 7-17-98 IHI memo from GMM to CR (A/CP)

- 6-29-98 facsimile correspondence from John Austin to GMM (A/CP)
- 2-16-98 handwritten notes of GMM (WP)
- 1-23-98 IHI interoffice memorandum from AW/SVE to CR, Derrick Stryker, Jeff Trendle, Susan Coble, Jeff Hooks, Dawn McIntyre, Ashely Markum, Kathy Cruise, Mary Barton Eilers, John Brothers, GMM, AS, Kevin Jones, Stefan Autrey, Robin Land, DH, Mike Russo, Rich Cicha re: International Heritage, Inc. Meeting Agenda and labeled confidential (note - attached to this document is: 1-23-98 GMM copy of email transmission from CR to DH, Mike Russo, Jeff Trendle, GMM, Dawn McIntyre cc'd Chante Jordan, JB, AW, Jeff Hooks and 1-2-98 IHI memorandum from CR to SVE and GMM cc'd JB & AW) (A/CP)
- 12-12-97 correspondence from BEW to RB (A/CP)
- 12-9-97 facsimile correspondence from BEW to JB (A/CP)
- 11-3-97 handwritten notes of GMM (WP)
- 10-30-97 correspondence from FDB to GMM (A/CP)
- Miscellaneous handwritten notes of GMM (WP)
- 9-24-97 correspondence from FDB to Hannah Hall, Freedom of Information Act Officer, Securities and Exchange Commission re: Freedom of Information Act Confidential Treatment Request (A/CP)
- 6-30-97 facsimile correspondence from GMM to FDB & DA (A/CP)
- 7-30 facsimile correspondence from Garrett Francis to GMM, BEW & CTF (A/CP)
- 7-29-97 facsimile correspondence from Garrett Francis, Epley Associates Inc. to BEW cc'd CTF & GMM (A/CP)
- 7-30-97 handwritten notes of GMM (WP)
- 9-14-98 correspondence from BEW to GMM (A/CP)
- 7-29-98 correspondence from BEW to GMM marked attorney-client privileged (A/CP)
- Bise
  - facsimile correspondence from BEW to GMM (A/CP)
  - 9-29-98 facsimile correspondence from BEW to Susan Halpern (A/CP)
  - 9-22-98 correspondence from GMM to BEW with attachment (A/CP)
  - 9-16-98 GMM copy of email transmission from Lisa Woolridge to GMM (A/CP)
  - 9-8-98 IHI memorandum from GMM to CR with attachment (A/CP)
  - 9-7-98 GMM copy of email transmission from GMM to Stephanie Harris cc'd Mike Russo (A/CP)
  - 9-2-98 facsimile correspondence from BEW to GMM (A/CP)
  - 9-2-98 facsimile correspondence from BEW to GMM (A/CP)
  - 8-20-98 facsimile correspondence from CR to BEW cc'd GMM (A/CP)
  - 7-1-98 correspondence from BEW to GMM (A/CP)
  - 10-27-98 facsimile correspondence from CR to BEW cc'd SVE, JB, GMM & Pete Scanlon and handwritten notes of GMM attached (WP)
  - 8-10-98 correspondence from BEW to GMM (A/CP)
  - 3-13-98 copy of Alabama Judicial Data Center Dekalb County Docket Notice with post-its bearing handwritten notes of GMM attached (WP)
- Donald W. Butler et al v. IHI

- 9-2-98 GMM copy of email transmission from Bonnie Little on behalf of CPC to GMM cc'd Stephanie Harris (A/CP)
- 10-8-98 correspondence from GMM to BEW with attachment (A/CP)
- GMM copy of email transmission to Tim Otto & CR (A/CP)
- 9-29-98 facsimile correspondence from BEW to GMM with handwritten notes of GMM attached (A/CP)
- 9-10-98 correspondence from GMM to BEW with attachment (A/CP)
- 9-4-98 facsimile correspondence from GMM to MV cc'd BEW (A/CP)
- 9-4-98 GMM copy of email transmission from DH to GMM with handwritten notes of GMM attached (A/CP)
- 9-4-98 correspondence from GMM to MV with attachments (A/CP)
- 9-3-98 correspondence from GMM to MV (A/CP)
- 8-31-98 facsimile correspondence from BEW to GMM (A/CP)
- 8-31-98 facsimile correspondence from BEW to GMM (A/CP)
- 8-25-98 GMM copy of email transmission from Val Tisdale to GMM cc'd Stephanie Harris (A/CP)
- 8-25-98 GMM copy of email transmission from Val Tisdale on behalf of CPC to GMM cc'd Stephanie Harris (A/CP)
- 8-25-98 5:17 p.m. GMM copy of email transmission from Val Tisdale to GMM cc'd Stephanie Harris (A/CP)
- 8-25-98 12:59 p.m. GMM copy of email transmission from Val Tisdale to GMM cc'd Stephanie Harris (A/CP)
- GMM copy of email transmission to Stephanie Harris cc'd Mike Russo & Norma Baker (A/CP)
- 8-24-98 correspondence from GMM to BML with attachment (A/CP)
- 9-28-98 facsimile correspondence from BEW to GMM (A/CP)
- Butler v. IHI Attorney Notes
  - 9-8-98 handwritten notes of GMM (WP)
- First Data
  - 5-18-98 correspondence from BEW to SVE (A/CP)
  - 6-8-98; 6-2-98; 4-7-98; 3-31-97; 3-20-97; 8-17-97 handwritten notes of GMM (WP)
  - 3-31-97 correspondence from BEW to SVE with attachment (A/CP)
  - Draft of Defendant's First Set of Interrogatories and First Request for Production of Documents to Plaintiff bearing handwritten notes of GMM (WP)
  - Miscellaneous handwritten notes of GMM (WP)
  - Miscellaneous document entitled Interrogatories bearing handwritten notes of GMM (WP)
  - 5-18-98 correspondence from BEW to GMM (A/CP)
- Miscellaneous Documents
  - 8-4-98 facsimile correspondence from GMM to BEW and MV (A/CP)
  - 7-9-98 correspondence from GMM to MV (A/CP)
  - 7-7-98 correspondence from GMM to BEW (A/CP)



- 9-24-98 facsimile correspondence from GMM to AEF (A/CP)
- 9-1-98 facsimile correspondence from AW to BEW (A/CP)
- 9-14-98 correspondence from BEW to RB (A/CP)
- 9-7-98 IHI memorandum from GMM to CR (A/CP)
- 9-3-98 correspondence from GMM to MV (A/CP)
- 8-31-98 facsimile correspondence from BEW to GMM (A/CP)
- 8-24-98 correspondence from GMM to BEW and MV (A/CP)
- 8-20-98 facsimile correspondence from GMM to Katherine Boticelli (A/CP)
- 8-14-98 correspondence from GMM to BML (A/CP)
- 7-29-98 correspondence from BEW to GMM marked attorney-client privileged (A/CP)
- 4-13-98 correspondence from GMM to LS & CS (A/CP)
- 8-13-98 correspondence from GMM to LS & CS with handwritten notes (A/CP)
- 4-6-98 correspondence from GMM to RB with attachment (A/CP)
- Gina Josephson v. IHI Attorneys Notes
  - 9-9-98 handwritten notes of GMM (WP)
  - Internet research of news article by David Ranii (WP)
- Miscellaneous Documents
  - 9-22-98 IHI memorandum from GMM to AEF marked confidential attorney-work product (A/CP)
  - 9-8-98 facsimile correspondence from AEF to GMM (A/CP)

**BOX 96W342I 065**

- SEC – Request for Information
  - 9-30-97 facsimile correspondence from GMM to AS (A/CP)
  - 6-12-97 correspondence from GMM to FDB (A/CP)
  - 6-4-97 facsimile correspondence from GMM to RSH, Steve Wolosky, FDB & DA (A/CP)
  - 6-5-97 facsimile correspondence from GMM to AS (A/CP)
  - 5-29-97 facsimile correspondence from DA to GMM with attachment (A/CP)
  - 5-30-97 facsimile correspondence from GMM to RSH (A/CP)
  - 5-30-97 facsimile correspondence from DA to SVE, JB, GMM & JAB (A/CP)
  - 5-29-97 IHI memorandum from AS to GMM (A/CP)
  - 5-30-97 facsimile correspondence from AS to GMM (A/CP)
  - 5-30-97 facsimile correspondence from DA to SVE, CR & GMM (A/CP)
  - 5-30-97 draft of letter to Mr. James E. Long, District Counsel, Securities and Exchange Commission re: International Heritage, Inc. with handwritten notes and edits from GMM (WP)
  - 5-30-97 facsimile correspondence from Steve Wolosky to GMM (A/CP)
  - 5-29-97 facsimile correspondence from DA to GMM (A/CP)
  - 5-29-97 facsimile correspondence from GMM to RSH, Steve Wolosky, FDB, DA (A/CP)
  - 5-29-97 handwritten notes of GMM (A/CP)



- 4-25-97 facsimile correspondence from GMM to FDB, DA, RSH, Steve Wolosky with handwritten notes on yellow post-its from GMM attached (A/CP)
- 5-12-97 facsimile correspondence from AW to BEW (A/CP)
- 5-23-97 correspondence from GMM to RSH, Steve Wolosky, FDB with attachment (A/CP)
- 5-27-97 handwritten notes of GMM (WP)
- 5-30-97 draft of letter to James Long, District Counsel, SEC, re: International Heritage, Inc. (MA-1441) (WP)
- 5-22-97 facsimile correspondence from GMM to GMM (A/CP)
- 5-22-97 second facsimile correspondence from GMM to GMM (A/CP)
- 5-14-97 handwritten notes of GMM (WP)
- 5-14-97 facsimile correspondence from GMM to RSH, Steve Wolosky (A/CP)
- 5-12-97 facsimile correspondence from GMM to FDB (A/CP)
- 5-12-97 handwritten notes of GMM (WP)
- 5-12-97 facsimile transmission from AW to BEW (A/CP)
- Miscellaneous Documents
  - 5-26-98 facsimile correspondence from GMM to BEW (A/CP)
  - 4-2-98 correspondence from JB to GMM (A/CP)
  - Draft chart entitled Litigation Report bearing handwritten notes of GMM (WP)
  - 4-1-98 copy of draft document entitled International Heritage, Inc. December 31, 1997 Audit open items bearing handwritten note from Rob Hukezalie to GMM (WP)
  - 2-5-98 correspondence from JB to GMM (A/CP)
- Audit 1997
  - 8-3-98 GMM copy of email transmission from Heather Slinkard to GMM (A/CP)
  - 2-13-98 preliminary draft of correspondence to the Audit Committee and Board of Directors of IHI from EJBW (WP)
  - note to GMM, RH, Davin Brown re: companies first and second auditor bearing handwritten notes as well (WP)
- Miscellaneous documents
  - 2-18-97; 5-7-97; 3-9-97; 3-6-97 handwritten notes of GMM (WP)
- Babener & Associates
  - 10-19-98; 9-22-98; 8-19-98; internal document by GMM regarding legal fees and expenses with attachment (A/CP)
  - 7-1-98 correspondence from Babener & Associates to SVE re: legal expenses (A/CP)
- Miscellaneous documents
  - 12-2-97 GMM copy of email transmission from Mike Russo to GMM (A/CP)
  - 10-15-97 GMM copy of email transmission from Shannon Zeko to GMM (A/CP)
  - 9-25-97 handwritten notes of GMM (A/CP)

- Folder labeled Leonard W. Burningham, Esq. Billing (A/CP)
  - 9-11-98; 8-5-98; 6-5-98; 5-7-98; internal document by GMM regarding legal fees of IHI (A/CP)
  - 5-5-98 statement from LWB to IHI regarding legal fees (A/CP)
  - 5-12-98 correspondence from GMM to LWB (A/CP)
- 2-13-98 memorandum from GMM to SVE (A/CP)
- Spring issue 1998 IHI Business Journal bearing handwritten edits from GMM (WP)
- 2-2-98 winter issue 1998 IHI Business Journal from GMM with handwritten notes and edits from GMM and memo from Sherlita to Stan attached (WP)
- March to New Orleans flyer (WP)
- 5-19-97 handwritten notes of GMM (WP)
- 5-19-97 facsimile correspondence from GMM to Dawn McIntyre (A/CP)
- 4-25-97 correspondence from GMM to Dawn McIntyre (A/CP)
- Draft trademark license agreement with handwritten notes from GMM (WP)
- 9-4-98 handwritten notes of GMM (WP)
- Check Processing for Research
  - 11-10-97 GMM copy of email transmission from Jeff Trendle to GMM w/ information regarding North Carolina General Assembly 1997 session Senate Bill 562 attached (A/CP)
  - 10-29-97 correspondence from John Austin to GMM with attachment (A/CP)
  - 10-28-97 GMM copy of email transmission from Jeff Trendle to GMM cc'd Keith Mackey (A/CP)
- Check Requests
  - 5-4-98; 3-3-98; 12-29-97 internal document from GMM regarding expenditures (A/CP)
  - Internal document from GMM regarding legal fees of IHI (A/CP)
- Miscellaneous Documents
  - 9-28-98 correspondence from Rob Hukezalie to BEW (A/CP)
  - 7-16-98 facsimile correspondence from Elizabeth Glynn, Esq. to GMM (A/CP)
  - 7-17-98 facsimile correspondence from Linda Halsteadt to BEW (A/CP)
  - 7-17 handwritten notes of GMM (WP)
  - 10-2-97 handwritten notes of GMM (WP)
  - Folder labeled Rick Chicha
    - handwritten notes of GMM (WP)
    - 10-16-97 handwritten notes of GM (WP)
    - 10-16-97 GMM copy of email transmission from Rich Chicha to GMM (A/CP)
    - 10-16-97 facsimile correspondence from GMM to Ms. Brooks (A/CP)
    - 10-2-97 GMM copy of email transmission from Rich Chicha to GMM (A/CP)
    - 10-2-97 handwritten notes of GMM (WP)
    - 9-15-97 copy of document from financial collection agencies with yellow post-it bearing handwritten notes of GMM attached (A/CP)
  - 5-18-98 file copy of correspondence from GMM to David Poor regarding contract number 980600378S, International Heritage, Inc. Meeting June 5 – 6, 1998 (A/CP)

- 7-16-98; 7-13-98; 7-9-98; 9-10-98 (w/ First Union Indemnity Agreement for account not closing attached) handwritten notes of GMM (WP)
- 9-29-98 GMM copy of email transmission from AW to GMM, Susan Beasley (A/CP)

**BOX 96W342I 066**

• Miscellaneous Documents

- 6-4-98 memorandum from CR to all IHI vice presidents and SVE (A/CP)
- 6-15-98 memorandum from GMM to Board of Directors (A/CP)
- 4-15-98 facsimile correspondence from LWB to GMM and RSH (A/CP)
- Legal research regarding the 1934 act rules (WP)
- 5-6-98 facsimile communication from Terry L. Shulman to GMM (A/CP)
- 11-15-96 facsimile correspondence from Craig Dalton of Poyner Spruil to GMM (A/CP)
- 11-15-96 facsimile correspondence from GMM to SVE (A/CP)
- Draft of International Heritage, Inc. 1996 Option Plan, Notice of Stock Option Grant attached to note to GMM from Angie Cox (WP)
- 11-12-96 draft of IHI 1996 Stock Option Plan with handwritten notations and edits from GMM (WP)
- 10-30-96 handwritten notes from GMM (WP)
- 5-1-98 handwritten notes from GMM (WP)
- 4-30-98 correspondence from Nora Roman to Robert Hukezalie with numerous handwritten notations from GMM (A/CP)
- Draft of employment agreement between IHI and Michael D. Hoskins with handwritten notations and edits from GMM (WP)
- 9-9-98 copy of email transmission of GMM from Susan Beasley to GMM (A/CP)
- 9-2-98 copy of email transmission of GMM from Susan Beasley to GMM (A/CP)
- 7-8-98 copy of correspondence from Susan Beasley to Michael Hoskins with handwritten notes by GMM attached (A/CP)
- 2-24-98 correspondence from BEW to GMM (A/CP)
- 12-3-97 handwritten notes from GMM (WP)
- 5-21-98 GMM copy of email transmission from Ed Cary to GMM with affinity agreement draft attached bearing handwritten notes and edits from GMM (A/CP)
- 6-16-98 handwritten notes of GMM (WP)
- 6-10-98 draft of affinity agreement with handwritten notations and edits from GMM (WP)
- 5-29-98 facsimile correspondence from IHI to GMM (A/CP)
- 6-2-98 facsimile correspondence from David Lamarch to GMM (A/CP)
- 5-29-98 facsimile correspondence from GMM to Ed Cary and Stephanie Harris (A/CP)
- 5-29-98 facsimile correspondence from David Lamarch to GMM (A/CP)
- 5-29-98 facsimile correspondence from GMM to Stephanie Harris (A/CP)
- Draft of non-disclosure agreement with handwritten notes from GMM (WP)
- 9-23-98 facsimile correspondence from GMM to BEW (A/CP)
- 3-19-98 memorandum from GMM to Rob Hukezalie (A/CP)
- Draft of non-disclosure/consulting agreement with numerous handwritten notes and edits from GMM (WP)
- 1-23-98 correspondence from Derrick Stryker to Rob Hukezalie with handwritten notes from GMM attached (A/CP)

- 1-29-98 draft of consulting agreement with handwritten notes and edits from GMM (WP)
- 8-25-98 handwritten notes from GMM (WP)
- 8-11-98 facsimile correspondence to GMM from Gary Agron of Spencer Edwards Inc. (A/CP)
- Miscellaneous handwritten notes of GMM with no date (WP)
- 8-4-98 handwritten notes of GMM (WP)
- 8-3-98 draft letter to GMM from Frederick A. Hutner, Jr. (WP)
- 8-3-98 handwritten notes of GMM (WP)
- 9-15-98 GMM copy of facsimile transmission to Mike Russo with facsimile attachments (A/CP)
- 9-15-98 facsimile correspondence from JB to GMM (A/CP)
- Employment General
  - 2-2-98 GMM copy of email transmittal from Susan Beasley to GMM (A/CP)
  - 2-6-98 memorandum from GMM to Susan Beasley (A/CP)
  - 1-5-98 memorandum from GMM to Jeff Trendle with 1-5-98 letter from Joe Brown to GMM attached (A/CP)
  - 12-5-97 memorandum from GMM to Susan Beasley and CR with attachment (A/CP)
- Employee Matters
  - 3-5-98 facsimile correspondence from GMM to Julie Bell with handwritten notes from GMM attached (A/CP)
  - 6-25-97 handwritten notes from GMM (WP)
  - 6-23-97 handwritten notes from GMM (WP)
- Employee Manual
  - Draft of Employee welcome message with handwritten notes from GMM and some edits (WP)
- Van Etten Employment Agreement
  - 2-28-? handwritten notes from GMM (WP)
  - 11-20-95 copy of correspondence from GMM to CS and LS with attachments (A/CP)
  - Draft employment agreement with floppy diskette attached (WP)
  - 2-20-96 correspondence from BEW to GMM (A/CP)
  - 12-6-95 correspondence from BEW to GMM (A/CP)
  - 12-6-95 facsimile correspondence from GMM to CS and LS (A/CP)
  - 11-17-95 correspondence from BEW to GMM (A/CP)
  - 11-15-95 facsimile correspondence from GMM to BEW (A/CP)
  - 11-13-95 correspondence from BEW to GMM, CS and LS (A/CP)
  - Miscellaneous note from GMM (WP)
  - 10-24-95 correspondence from BEW to GMM with draft employment agreement attached with numerous edits (A/CP)
  - 10-26-95 correspondence from GMM to CS, LS, SVE and BEW (A/CP)
  - 10-24-95 facsimile correspondence from BEW to GMM (A/CP)

- 10-26-95 correspondence from GMM to CS, LS, SVE and BEW (A/CP)
- 10-23-95 facsimile correspondence from GMM to BEW (A/CP)
- 5-29-97 correspondence from GMM to AS with attachments (A/CP)
- 11-20-95 correspondence from GMM to CS and LS with employment agreement, promissory note copy and additional employment agreement attached (A/CP)
- 10-10-95 facsimile correspondence from BEW to GMM (A/CP)
- 10-10-95 correspondence from BEW to GMM, CS and LS (A/CP)
- 9-21-95 facsimile correspondence from BEW to GMM (A/CP)
- 9-22-95 correspondence from GMM to Thomas DA (A/CP)
- copy of employment agreement signed 12-11-95 by SVE and CS, signed 12-18-95 by LS (A/CP)
- FTCV Future Net
  - 5-21-98 correspondence from JAB to SVE with attachment (A/CP)
- Furneaux, Barry IHI Independent Sales Representative
  - 1-2-98 correspondence from Barry Furneaux to GMM with note from GMM attached (A/CP)
  - 1-2-98 memo from GMM to DH (A/CP)
  - 12-30-97 handwritten notes of GMM (WP)
  - 12-18-97 facsimile correspondence from Barry Furneaux to SVE with note from SVE to GMM written on it (WP)
- Harrell, Bernard (Legal services)
  - 4-9-98 internal document of GMM regarding legal fees (A/CP)
  - 5-20-98 internal document from GMM regarding legal fees (A/CP)
- EB Harvey Online Ordering System
  - 8-31-95 handwritten notes of GMM (WP)
  - 8-28-95 handwritten notes of GMM (WP)
  - Memorandum of Understanding executed by IHI but not executed by Ed Harvey (WP)
- James S. Holiday, Jr., Esq. Billing
  - 6-25-98 document from James S. Holiday, Jr. to IHI care of GMM with 6-15-98 GMM document attached (A/CP)
  - 6-5-98 internal document from GMM regarding legal fees with 5-25-98 document from James S. Holiday attached (A/CP)
  - 5-8-98 GMM copy of email transmittal from Deborah Blevins to GMM (A/CP)
  - 4-17-98 correspondence from James Holiday to GMM with attachment (A/CP)
  - 5-20-98 correspondence from James Holiday to GMM (A/CP)
  - 5-8-98 internal document of GMM regarding legal fees with 4-25-98 document from James Holiday attached (A/CP)
  - 4-3-98 internal document from GMM regarding legal fees with attachment (A/CP)

- 3-3-98 memorandum from GMM to Jeff Trendle with attachment (A/CP)
- 2-2-98 memorandum from GMM to Jeff Trendle with attachment (A/CP)
- 1-5-98 memorandum from GMM to Jeff Trendle with attachment (A/CP)
- 12-15-97 memorandum from GMM to Jeff Trendle with attachment (A/CP)
- 11-18-97 memorandum from GMM to JB and Jeff Trendle with attachment (A/CP)
- 10-27-97 memorandum from GMM to Keith MacKay with attachment (A/CP)
- 9-9-97 correspondence from GMM to Keith MacKay with attachment (A/CP)
- In House Monitor Reports
  - 6-15-98 memorandum from CR to IHI vice presidents with attachments (A/CP)
- Insurance Business
  - CR copy of email communication to Kevin Jones with handwritten note to DH, cc'd GMM from CR (A/CP)

**BOX 96W342I 067**

- Jeff Babener
  - 11-9-95 correspondence from JAB to SVE (A/CP)
  - 8-3-95 correspondence from JAB to SVE (A/CP)
  - Research regarding trade and commerce (WP)
  - Research regarding Governor's Consumer Protection Divisions Rules and Regulations for the State of Louisiana (WP)
  - 7-25-95 correspondence from JAB to Jo Mariano of the Direct Selling Association regarding Louisiana Business Opportunity Statute (A/CP)
  - Legal Research regarding pyramid promotional schemes (WP)
  - 11-27-95 draft memo from IHI regarding Louisiana Business Opportunity Act (WP)
  - 11-14-95 client's copy of correspondence from JAB to Ross A. Dooley, Consumer Protection Section of the Louisiana Department of Justice (A/CP)
  - 10-20-95 correspondence from Jeffrey Ackermann to JAB regarding letter received from Louisiana Department of Justice (A/CP)
  - 10-17-95 correspondence from Ross A. Dooley, LA Dept. of Justice to Jeffrey Ackermann (A/CP)
  - Biographical information of JAB (A/CP)
  - 11-27-95 correspondence from JAB to SVE (A/CP)
  - 10-24-95 correspondence from JAB to SVE w/ memo regarding new Texas MLM legislation attached (A/CP)
  - 12-13-95 facsimile correspondence from JAB to JB (A/CP)
  - draft International Heritage, Inc. Statement of Policy and Procedures (A/CP)
  - 6-13-95 correspondence from Mitchell A. Goldstein of Babener & Associates to SVE w/ memo regarding Canadian marketing attached (A/CP)
  - 6-1-95 memorandum from Babener & Associates to SVE w/ attachments regarding individual earnings, testimonial statements and earnings projections (A/CP)
  - 6-1-95 memorandum from Babener & Associates to SVE regarding FTC rule on door-to-door sales (A/CP)